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Attorney for Defendant
Cody. Cramer

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-00155-JAM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
JOSHUA WILSON and) Date: September 26, 2023
CODY CRAMER,) Time: 9:00 a.m.
Defendants.) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for September 26, 2023, at 9:00 be continued to November 28, 2023 at 9:00 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on September 26, 2023 at 9:00 a.m.
2. By stipulation, Mr. Cramer now moves to continue the status conference to **November 28, 2023, at 9:00 a.m.**
3. To date, the government has produced approximately 850 pages and various audio/video recordings of discovery to the defendants.

- 1 4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,
2 investigate and research possible defenses, research potential pretrial motions, and
3 explore potential resolutions to the case, and otherwise prepare for trial.
- 4 5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance
5 would deny them the reasonable time necessary for effective preparation, taking
6 into account the exercise of due diligence.
- 7 6. Neither the government nor Mr. Wilson object to the continuance.
- 8 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
9 Act), the parties request that the time period between September 26, 2023 and
10 November 28, 2023, inclusive, be deemed excludable pursuant to 18 U.S.C. §
11 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
12 granted by the Court at the defense's request, based on a finding that the ends of
13 justice served by granting the continuance outweighs the best interest of the
14 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

15 Respectfully submitted,

16 HEATHER E. WILLIAMS
17 Federal Defender

18 Date: September 18, 2023

/s/ Hootan Baigmohammadi
 HOOTAN BAIGMOHAMMADI
 Assistant Federal Defender
 Attorneys for Mr. Wilson

20 Date: September 18, 2023

/s/ Kyle Knapp
 Kyle Knapp
 Attorney for Mr. Cramer

22 Date: September 18, 2023

 PHILLIP A. TALBERT
 United States Attorney

25 /s/ James R. Conolly
 James R. Conolly
26 Assistant United States Attorney
27 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: September 19, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE